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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

JEFFERSON-PILOT INSURANCE

COMPANY, Case No. C-1-02-479

Plaintiff, Judge Michael Barrett

VS.

JOINT MOTION FOR CHRISTOPHER L. KEARNEY,

EXTENSION OF TIME

Defendant

Now come the parties, by and through their counsel, and jointly move for an Extension of Time to file the Pretrial Stipulations and the Joint Final Pretrial Statement until March 14, 2007. This extension is required due to the scheduling conflicts of counsel and the need for more time to agree to the stipulations. This Extension, in itself, will not prejudice the current trial date or any other dates at issue in the case.

Respectfully submitted,

s/ William R. Ellis

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent to counsel of record via the CM/ECF electronic filing system this 9th day of March, 2007.

s/ William R. Ellis

William R. Ellis Trial Attorney for Plaintiff Jefferson-Pilot Life Insurance Company, and Cross-Claim Defendant, Disability Management Services, Inc.